

THE HONORABLE JOHN C. COUGHENOUR

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

UNITED STATES,

Plaintiff,

vs.

KENNETH WARREN RHULE and
KENNETH JOHN RHULE,

Defendants.

Case No. 2:20-cr-00105-JCC

DEFENDANTS' UNOPPOSED
MOTION TO CONTINUE PRETRIAL
MOTIONS DEADLINE

**Note on Motions Calendar: September
10, 2020**

Defendants Kenneth Warren Rhule and Kenneth John Rhule, by and through their respective attorneys, hereby request that the Court continue the pretrial motions deadline in this matter from the present deadline of September 10, 2020, to September 17, 2020. The government has indicated that it does not oppose the requested continuance.

This motion is made for the following reasons:

1. On August 5, 2020, Defendants Kenneth Warren Rhule and Kenneth John Rhule were both charged with conspiracy to manufacture and distribute marijuana and marijuana products in violation of 18 U.S.C. §§ 841(a)(1), 841(b)(1)(A), and 846. The indictment alleges that this conspiracy involved 1,000 kilograms or more of marijuana. If

convicted, both Kenneth Warren Rhule and Kenneth John Rhule could face a mandatory minimum of 10 years' imprisonment. Kenneth Warren Rhule has also been charged with conducting an unlicensed money transmitting business in violation of 18 U.S.C. § 1960, money laundering in violation of 18 U.S.C. §§ 1956 and 2, and possessing a firearm during and in relation to a drug trafficking crime in violation of 18 U.S.C. § 924(c)(1)(1).

2. At the defendants' arraignment, on August 20, 2020, the Court set the pretrial motions deadline for September 10, 2020, and the trial for October 5, 2020.
3. To date, the government has disclosed approximately 1.8 TB of discovery, containing over 341,000 Bates-numbered pages, along with spreadsheets and video recordings.
4. The government has been investigating this case for over two years and has had a significant head start in preparing its case. Counsel for defendant Kenneth Warren Rhule joined this case in March 2020 and counsel for Kenneth John Rhule joined the case in late July 2020, shortly before the defendants were indicted on August 5, 2020.
5. Good cause exists to extend the pretrial motions deadline in this case, given the immense volume of discovery produced by the government and the short amount of time that counsel for defendants have had to review the discovery and prepare a defense.
6. Extending the pretrial motions deadline would also allow the parties time to confer about setting a reasonable case schedule going forward. This case is currently set for trial on October 5, 2020. Given the volume of discovery and the need to prepare an effective defense, counsel for defendants anticipate requesting a continuance of that trial date. Before doing so, however, they would like to confer with counsel for the government, with the goal of developing a mutually agreeable schedule that will allow for effective preparation and representation of the defendants' interests, taking into account the exercise of due diligence. Accordingly, counsel for defendants request that the pretrial

1 motions deadline be extended by one week, while the parties confer on the case schedule
2 moving forward.

3 7. Counsel for defendants have spoken with counsel for the government, and the parties
4 agree that an extension of the pretrial motions deadline is warranted.

5 For these reasons, good cause exists to extend the pretrial motions deadline until September
6 17, 2020.

7 DATED this 10th day of September, 2020.

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9 **CALFO EAKES LLP**

10 By s/ Henry C. Phillips

11 Patty A. Eakes, WSBA No. 18888

12 Henry C. Phillips, WSBA No. 55152

13 1301 Second Avenue, Suite 2800

14 Seattle, WA 98101

15 (206) 407-2200 | Phone

16 (206) 407-2224 | Fax

17 Email: patty@calfoeakes.com

18 henryp@calfoeakes.com

19 *Attorneys for Defendant Kenneth Warren Rhule*

20 **SKELLENGER BENDER, PS**

21 By s/ Peter Offenbecher

22 Peter Offenbecher, WSBA No. 11920

23 1301 Fifth Avenue, Suite 3401

24 Seattle, WA 98101

25 206-623-6501 | Phone

206-447-1973 | Fax

Email: poffenbecher@skellengerbender.com

Attorney for Defendant Kenneth John Rhule